



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

DEC 26 2001

Sarah Brown, Treasurer
Ohio State Republican Party
211 S. Fifth Street
Columbus, OH 43215

Identification Number: C00162339

Reference: 12 Day Pre-Special Report (1/1/01-5/30/01)

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a contribution(s) designated for the Special Primary election in the state of Virginia. Since the state of Virginia did not hold a Special Primary election in 2001, any contribution(s) so designated by your committee must be returned by the candidate committee or redesignated by your committee in accordance with 11 CFR 110.1(b).

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during

which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this contribution(s), prompt action in obtaining a refund and/or requesting a redesignation will be taken into consideration.

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$58,232.75 from the Ohio Republican Party. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your 2000 Amended Year End Report, dated 8/10/01. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Schedule H4 supporting Line 21(a) of the Detailed Summary Page (pertinent portion(s) attached) discloses a \$1,673.52 disbursement to Verizon Wireless for "Hdqts State Cell Phones". Please clarify the nature of this activity. If this payment was not for a shared activity, the disbursement should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Schedule H4 of your report discloses contributions to the Ashbrook Center and Gary Burkholder. Please be advised that contributions to non-federal committees/organizations and/or people representing non-federal committees/organizations do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Contributions to non-federal committees/organizations and/or people representing non-federal committees/organizations should be itemized on a Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of these contributions is not permissible. 11 CFR §102.5(a)(1)(i)

The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H4 of your report discloses voided or returned checks for expenditures made during this or previous reporting periods. Please clarify if and when these checks were reissued. If they were not reissued, please clarify the steps your committee has taken to account for the federal portion of these voided or returned checks in order to avoid the acceptance of a prohibited in-kind contribution.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses refunds or rebates from several local party organizations. Please clarify whether the original disbursements were reported on Schedules B and/or Schedule H4. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Please provide further clarification regarding the activity on Schedule A supporting Line 15.

-Please clarify all expenditures made for "Airfare for Senators/Congress Govt" on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Please clarify the expenditure for "GOTV Victory Phone Banks". If the activity referenced specific House or Senate candidates, it should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of the expenditure was made on behalf of federal candidates, this should be reported on Schedules B, E or F for Lines 23, 24 or 25 of the Detailed Summary Page as appropriate.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "Consulting", "Mileage Supplies" and "Misc. Travel". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during

the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the mailing address, date, amount and purpose of such payments as required by 11 CFR §104.9(b).

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$102,149.54 in Shared Federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$102,263.46. Please amend your report to clarify this discrepancy.

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of \$715,043.63 in Shared Non-Federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$715,840.26. Please amend your report to clarify this discrepancy.

-The coordinated expenditure schedule (Schedule F) should disclose the following information: the identification of the designating committee, the payee's name and address, the purpose of the expenditure, the identification of the candidate supported, the office sought, state and district (if applicable), the date and amount of the payment and the aggregate general election expenditure total for each candidate supported. Please amend Schedule F by providing the identification of the candidate supported, the office sought, state and district, if applicable. 2 U.S.C. §441a(d)

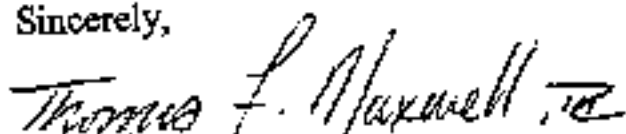
-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the date due. 11 CFR §§104.3(d) and 104.11(a)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from federal candidate committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-On Schedule D of your Amended 2000 Year End Report, dated 7/11/01, you disclosed a debt owed to Computersmith. This debt does not appear to be extinguished by the payments disclosed in your current report. Please amend your report to include this debt on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Ohio Republican State & Central Executive Committee

Full Name (Last, First, Middle Initial)

A Forbes For Congress

Mailing Address

1104 Madison Plaza, Ste 101

City

Chesapeake

State

VA

Zip Code

23320-

Purpose of Disbursement

Contribution To Committee Special Elect

Candidate Name

Category
Type

Office Sought:

House

Senate

President

Disbursement For:

☒ Primary

☐ General

☐ Other (specify) ▼

State:

District:

Date of Disbursement

05 / 15 / 2001

Amount of Each Disbursement this Period

5000.00

Transaction ID: 0615200154E1458

B.

C.

SUBTOTAL of Disbursements This Page (optional)

5000.00

TOTAL This Period (last page this line number only)

5000.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 238 / 459
(check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☒ 17

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NAME OF COMMITTEE (in Full)
Ohio Republican State & Central Executive Committee

Full Name (Last, First, Middle Initial) Ohio Republican Party		Date of Receipt 01 / 18 / 2001
Mailing Address 211 South Fifth Street		Amount of Each Receipt this Period 2158.25
City Columbus	State Zip Code OH 43215	
FEC ID number of contributing federal political committee.		Other Receipt
Name of Employer POLITICAL PARTY COMM.	Occupation POLITICAL PARTY COMM.	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 2158.25	
		Transaction ID: 0615200124C668873

Full Name (Last, First, Middle Initial) Ohio Republican Party		Date of Receipt 04 / 25 / 2001
Mailing Address 211 South Fifth Street		Amount of Each Receipt this Period 56074.50
City Columbus	State Zip Code OH 43215	
FEC ID number of contributing federal political committee.		Other Receipt
Name of Employer POLITICAL PARTY COMM.	Occupation POLITICAL PARTY COMM.	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 56232.75	
		Transaction ID: 0615200113C684795

C.

SUBTOTAL of Receipts This Page (optional)	56232.75
TOTAL This Period (last page this line number only)	56232.75

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

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 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (in full)

Ohio Republican State & Central Executive Committee

A. Full Name (Last, First, Middle Initial)
 Matthew Mason

Mailing Address

% Ohio Republican Party 211 S. Fifth Street

City State Zip Code
 Columbus OH 43215-

Purpose/Event:
 MILEAGE, HOTEL, CELL PHONE

Description:

Type of Allocated Activity:

☒ Admin./Voter Drive ☐ Fundraising
☐ Exempt ☐ Direct Candidate Support

Event Year-To-Date

0.00

Date 05 / 22 / 2001

Category/
 Type

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

58.13

392.87

449.00

Transaction ID: H40615200154E1432

A. Full Name (Last, First, Middle Initial)
 Amy Seboth

Mailing Address

% Ohio Republican Party 211 S. Fifth Street

City State Zip Code
 Columbus OH 43215-

Purpose/Event:
 mileage, meals, hotel

Description:

Type of Allocated Activity:

☒ Admin./Voter Drive ☐ Fundraising
☐ Exempt ☐ Direct Candidate Support

Event Year-To-Date

0.00

Date 05 / 22 / 2001

Category/
 Type

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

32.49

227.40

259.89

Transaction ID: H40615200154E1453

A. Full Name (Last, First, Middle Initial)
 Vernon Winslow

Mailing Address

Great Lakes PO Box 790292

City State Zip Code
 Saint Louis MO 63178-0292

Purpose/Event:
 Hdqts State Cell Phones

Description:

Type of Allocated Activity:

☒ Admin./Voter Drive ☐ Fundraising
☐ Exempt ☐ Direct Candidate Support

Event Year-To-Date

0.00

Date 05 / 22 / 2001

Category/
 Type

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

209.19

1464.33

1673.52

Transaction ID: H40615200154E1465

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE

+

NON-FEDERAL SHARE

= TOTAL AMOUNT

297.81

2084.60

2382.41

TOTAL This Period (last page for each line only) (Federal share to 21(a)(i)) and non-Federal share to 21(a)(ii)

FEDERAL SHARE

NON-FEDERAL SHARE

TOTAL AMOUNT

TOTAL This Period for the Non-Federal Share
 (used for line 31 of the detailed summary page)

